

LAW OFFICES  
**DAVID L. MAZAROLI**  
 11 PARK PLACE  
 NEW YORK, NY 10007  
 E-mail: [dlm@mazarolilaw.com](mailto:dlm@mazarolilaw.com)  
 Telephone (212)267-8480  
 Telefax (212)732-7352

USDS SDNY  
 DOCUMENT  
 ELECTRONICALLY FILED  
 DOC #: 7-26-07  
 DATE FILED: 7-26-07

July 26, 2007

TELEFAX: (212)805-6382

Honorable Victor Marrero  
 United States District Judge  
 United States Courthouse  
 500 Pearl Street  
 New York, New York 10007

JOINT LETTER OF COUNSEL

Re: Federal Insurance Company  
 v. RICKMERS TOKYO", et al..  
 07 Civ. 3372 (VM)  
 Our Files: 6C-1263 and 6C-1332

Dear Judge Marrero:

I represent the plaintiff in this nonjury admiralty action. This joint letter is also submitted on behalf of defense counsel. The action involves claims for damage and loss to separate shipments of steel products moving on different vessels from China to the United States. The amounts involved are not large by the Court's standards. For that reason counsel intend to focus at an early date on possible settlement. Plaintiffs' disclosure documents have been provided to defense counsel who advised that settlement discussions will be pursued without prejudice to the ocean carrier's prospective defenses based on the bill of lading forum selection clause.

Counsel anticipate that roughly 45 days will be needed to complete the informal disclosure process, discuss settlement, and obtain client instructions. For this reason counsel join in respectfully requesting that the Court allow until a date mid-September to settle the case or submit a scheduling order. The Court's attention is appreciated.

**SO ORDERED:** Request GRANTED. The time for ~~the~~ parties herein to submit a proposed ~~case~~ management plan is extended to 9-14-07.  
 7-26-07   
 DATE VICTOR MARRERO, U.S.D.J.

Respectfully,

  
 David L. Mazaroli

cc: Chalos, O'Connor & Duffy LLP  
 Attn.: Timothy Semenoro, Esq. (Via e-mail: mailto:[tsemenoro@codus-law.com](mailto:tsemenoro@codus-law.com))